Remarks

Reconsideration of this application is respectfully requested.

Please note that claim 27 is currently amended, so as to claim:

> *a broadband multimedia system, comprising: a broadband multimedia router communicatively connected to a data router and between a plurality of media sources and a plurality of network transmitters, and configured to encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia router; and a session manager, communicatively connected to said broad band multimedia router and configured to provide routing instructions to said broadband multimedia router for (i) directing said* ***video*** *streams received from said media sources to said network transmitters for transmitting over a broadband network and (ii) directing addressable data packets received from said data router to at least a selected one of said network transmitters for transmitting over said broadband network to a specific destination associated with address information included in said addressable data packets.*

Additionally, claims 28, 29 and 30 depend onto claim 27, and the scope of which is amended accordingly.

Hoarty et al do not disclose a system, which includes a broadband multimedia router communicatively connected to a data router which is configured to encapsulate packets of video streams within addressable packets for switching between inputs and outputs of said broadband multimedia router

Claims 27 and 28 stand rejected under 35 U.S.C. 103(a) as being unpatentable over Hoarty et al. (US 6,305,020 B1) in view of Addington (US 6,928,656 B1).

The Examiner argues that regarding claim 27, Hoarty discloses:

> *A broadband multimedia system, comprising: a broadband multimedia router (112 & 121) communicatively connected to a data router (122) and between a plurality of media sources (111) and a plurality of network transmitters (within distribution plant 14); and a session manager (113), communicatively connected to said broadband multimedia router and configured to provide routing instructions to said multimedia router (112 & 121), for directing said media stream received from said media sources (111) to said network transmitters for transmitting over a broadband network (i.e., cable network) and directing addressable data packets received from said data router (122) to at least a selected one of the said network transmitters for*

transmitting over said broadband network to a specific destination (particular home) associated with address information included in addressable data packets).

Applicants respectfully disagree with this description of the invention of Hoarty et al. Referring to figure 2a of Hoarty et al., the sources of backend switches 112 are: (a) network interface 216 which is in communication with an internet service provider; (b) return path processing telephone 212 which is in communication with telephone lines, and (c) return path processing cable 211 which is in communication with signals provided over a cable return path. Back end switches 112 are also in communication with web proxy and personal multimedia modules (PMM) boot and application server 213 as well as system manager 113 (see column 6, lines 34-45).

None of the sources which are offered by Hoarty et al are video sources, and therefore Hoarty et al fail to disclose a *broadband multimedia router communicatively connected to a data router and between a plurality of media sources and a plurality of network transmitters, and configured to encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia router.*

Furthermore, referring again to the system which is described by Hoarty et al and which is illustrated in figure 1, the video source is the system which is described by Hoarty et al is cable broadcast channels 120, which, as mentioned in the specification in column 5, lines 58-59, are routed over main fiber trunks 144a, 144b, and 144c, and are only addressed to home users 141 at distribution plant 14.

It is noted that even the limited amount of video channels which are not routed over main fiber trunks 144 but are provided to personal multimedia modules (PMMs) 122 via route 123, are provided not the any switch of the system (i.e. units 112 and 121) but to the personal multimedia modules 122, after the switching of both back end switches 112 and of distribution switches 121 was completed (see column 6, lines 5-11).

It is evident from the claims, the descriptions and the figures of Hoarty at al that neither any of the switches 112 and 121 nor a combination thereof receives any video stream from cable broadcast channels 120. This further stresses the novelty of the invention of the applicants, which facilitates of switching packets of video streams at the broadcast multimedia router, by way of encapsulating packets of video streams received from said media sources within addressable packets for switching, at the

broadcast multimedia router, between inputs and outputs of said broadband multimedia router.

The combination of Hoarty et al in view of Addington do not disclose a system, which includes a broadband multimedia router communicatively connected to a data router which is configured to encapsulate packets of video streams within addressable packets for switching between inputs and outputs of said broadband multimedia router

The examiner rejected all pending claims of this patent application as allegedly being unpatentable over at least Hoarty et al in view of Addington. (Claims 29 and 30 were further rejected in view to an additional patent).

The applicant claims that in order to establish a prima facie case of obviousness, three basic criteria must be met. The applicant claims that the prior art reference (or references when combined) do not teach or suggest all the claim limitations.

As discussed above, Hoarty et al fail to disclose a *broadband multimedia router communicatively connected to a data router and between a plurality of media sources and a plurality of network transmitters, and configured to encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia router,* but rather discloses a system wherein video streams are addressed to home users 141 at distribution plant 14, or, at best, are provided to personal multimedia modules (PMMs) 122 after the switching of both back end switches 112 and of distribution switches 121 was completed.

Addington disclose a system in which quadrature amplitude modulation (QAM) modulators 106 combine the MPEG formatted information for delivery as in-band data 107 via transmission medium 120 to subscriber location 150. Addington does not disclose a system in which any broadband multimedia router is configured to *encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for* ***switching*** *between inputs and outputs of said* ***broadband multimedia router***.

Therefore, even the combination of Hoarty et al in view of Addington does not teach of a system which includes a broadband multimedia router and a session manager which suggest the limitations to the claimed system of the applicant.

Furthermore, as stressed above, Hoarty et al teaches away from a broadband multimedia router which is configured to *encapsulate packets of* ***video*** *streams received*

from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia route, by clearly describing a claiming a providing of the video streams to units of the system other than any unit which may resemble the claimed broadband multimedia router.

Therefore, claims 27 and 28 should be allowed. Claims 29 and 30 which depend on claims 27 and 28 should also be allowed.

The combination of Hoarty et al in view of Addington and in further view of Brodigan do not disclose a system, which includes a broadband multimedia router communicatively connected to a data router which is configured to encapsulate packets of video streams within addressable packets for switching between inputs and outputs of said broadband multimedia router

The examiner rejected pending claims 29 and 30 of this patent application as allegedly being unpatentable over at Hoarty et al in view of Addington and in further view of Brodigan.

The applicant claims that in order to establish a prima facie case of obviousness, three basic criteria must be met. The applicant claims that the prior art reference (or references when combined) do not teach or suggest all the claim limitations.

As discussed above, Hoarty et al fail to disclose a *broadband multimedia router communicatively connected to a data router and between a plurality of media sources and a plurality of network transmitters, and configured to encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia router,* but rather discloses a system wherein video streams are addressed to home users 141 at distribution plant 14, or, at best, are provided to personal multimedia modules (PMMs) 122 after the switching of both back end switches 112 and of distribution switches 121 was completed.

Addington disclose a system in which quadrature amplitude modulation (QAM) modulators 106 combine the MPEG formatted information for delivery as in-band data 107 via transmission medium 120 to subscriber location 150. Addington does not disclose a system in which any broadband multimedia router is configured to *encapsulate packets of* ***video*** *streams received from said media sources within addressable packets for* ***switching*** *between inputs and outputs of said* ***broadband multimedia router***.

Brodigan discloses an upstream signaling arrangement for a VDSL network which uses head end data carousel to send an IP address of a programming host computer to end user set top boxes. Brodigan does not disclose a system in which any broadband multimedia router is configured to *encapsulate packets of **video** streams received from said media sources within addressable packets for **switching** between inputs and outputs of said **broadband multimedia router***.

Therefore, even the combination of Hoarty et al in view of Addington and in further view of Brodigan does not teach of a system which includes a broadband multimedia router and a session manager which suggest the limitations to the claimed system of the applicant.

Furthermore, as stressed above, Hoarty et al teaches away from a broadband multimedia router which is configured to *encapsulate packets of **video** streams received from said media sources within addressable packets for switching between inputs and outputs of said broadband multimedia route*, by clearly describing a claiming a providing of the video streams to units of the system other than any unit which may resemble the claimed broadband multimedia router.

Therefore, claims 29 and 30 should be allowed.

Conclusion

The applicant believes that in view of these arguments claims 27 to 30 should be allowed.

Respectfully submitted,

/Oren Reches

Oren Reches

Reg. No. 53,506